

UNITED STATES DISTRICT COURT
 for the
 Eastern District of Michigan

United States of America
 v.
 Adam Dalton JOHNSON

Case: 2:23-mj-30412
 Case No. Assigned To : Unassigned
 Assign. Date : 10/11/2023
 CMP USA V JOHNSON (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 9, 2023 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. §§ 2252A(a)(2)	Receipt of Child Pornography
18 U.S.C. § 2252(a)(5)(B)	Possession of Child Pornography

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: October 11, 2023

City and state: Detroit, Michigan



Complainant's signature

~~XXXXXXXXXXXXXXXX~~

Printed name and title

Brandon
 Massey, Special
 Agent FBI



Judge's signature

Hon. ~~Kimberly A. Allen~~ U.S. Magistrate Judge

Printed name and title

Anthony P. Patti

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**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Brandon Massey, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am currently employed as a Federal Bureau of Investigation (“FBI”) Special Agent and have been since July of 2019. I began my law enforcement career in 2009, and have served in numerous capacities, including patrol officer, detective, and United States Probation Officer. I am currently a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request an arrest warrant. I have drafted affidavits for arrest warrants and search warrants, including tracking of vehicles, cellular phones, and searches of residences and electronic devices. Throughout my career, I have investigated numerous federal violations, including cases involving child pornography the sexual exploitation of children.

2. This This affidavit is submitted in support of an application for a criminal complaint and arrest warrant for Adam Dalton Johnson (hereinafter “Johnson”) for violations of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

3. The statements contained in this affidavit are based in part on information provided by U.S. law enforcement officers, written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from investigative sources of information, and my experience, training, and background as a Special Agent.

4. This affidavit is submitted for the limited purpose of securing an arrest warrant. I have not included every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish probable cause that Johnson has violated 18 U.S.C. §§ 2252A.

FACTS ESTABLISHING PROBABLE CAUSE

5. On or about October 9, 2023, a Special Agent with the FBI acting in their official capacity as an Online Covert Employee ("OCE"), was engaged in covert activity on an Internet social media website known as "Kik."

6. The OCE discovered a chat room labeled #daughdadreal "Real Daughtr Dad" which required verification from the administrator prior to being allowed access. Based on their training and experience, the OCE believed this chat room may be utilized by individuals seeking to engage in trading or providing images that may constitute Child Sexual Abuse Material, also known as "CSAM." The OCE was contacted by the administrator of the group who used the screenname "Humble." "Humble" required the OCE to send in verification to

remain in the group. The OCE provided agents with the actual criteria required by the administrator, as depicted below.

7. The criteria, in part, required the OCE to provide a "live picture" of themselves holding up four fingers and a non-live picture of their daughter. Additionally, the OCE could send a photograph of their daughter followed by a "live picture" of the background with four fingers.

8. "Humble" then began corresponding with the OCE. Some of the messages sent by "Humble" and received by the OCE are depicted below:

- Very cute daughter mines 14 too"
- "Love having verified dads to talk to"
- "Mines 14 too MI 42"

9. On October 9, 2023, at approximately 1:55 pm (central standard time), "Humble" posted two live images on Kik of a girl sitting on a couch wearing leggings. The background was visible showing part of the house. The subject's shoe was also visible in the corner of the picture. The subject then sent a live image directly to the OCE showing what appeared to be a teenage girl in the background. The female appeared to be the same in all three images based on clothing.

10. "Humble" then sent the following additional messages:

- "When she was younger I did stuff"

- I mean step daughters is kinda hot but not the same”

11. During a conversation between the OCE and “Humble” on October 10, 2023, “Humble” informed the OCE that he had a video of known and close to him showering. Additionally, “Humble” stated that he wanted to set up a camera in the room of a minor female known and close to him in her room so he could watch her masturbate.

12. In late September 2023, a Kik user was arrested in Minnesota for distributing CSAM in groups focused on “fathers and daughters.” During a recorded interview and after being advised of his Miranda Rights, the subject informed agents that he was invited into three Kik groups by an individual with the screenname of “Humble.” The subject informed agents that one of the groups he joined was called something like “Daddy young undies” and another was something like “Daddy and Daughters.” The subject admitted to agents that while in these groups, he distributed pictures that he took of his minor daughter that depicts the girl’s mid-section from her belly button down to the bottom of her knees/ankles, with her vagina clearly visible. It is noted that for an individual to invite someone to a group on Kik, the individual must be a member of that group.

13. Pursuant to a subpoena served on September 26, 2023, KIK provided Internet Protocol (IP) address information which showed that “Humble” was using Wide Open West Internet to access his account. Pursuant to a subpoena served on

September 28, 2023, Wide Open West provided information that identified Johnson as the account holder, Johnson's address as the address to which the IP address was assigned, and the email address associated with the account as adamjohnson***@gmail.com. I know that IP addresses are assigned to customers by Internet Service Providers are unique to individual customer accounts/addresses and are not shared.

14. On October 10, 2023, a search warrant was issued in the Eastern District of Michigan for Johnson's person and residence. On that same day, the search warrants were executed, and multiple electronic devices were seized, including Johnson's cell phone and a Micro SD Card which was found in Johnson's wallet.

15. During a preliminary review of Johnson's cell phone, numerous CSAM images and videos were observed. Many of the CSAM images and videos were discovered in Johnson's Kik account in "Daddy/Daughter" groups. The following is a sample of the CSAM content found in Johnson's Kik account:

- a. An image that depicted a prepubescent female from the waist down with her genitals clearly shown. This image was sent to Johnson on Kik by another Kik user. Johnson responded to the image by replying "Mmmm that is pure perfection." "Perfect little pussy."

b. A video which depicted a female that appeared to be under the age of six engaging in intercourse with an adult male.

16. A preliminary review of the Micro SD Card found in Johnson's wallet revealed approximately 20 images of a female that appeared to be under the age of 13. The images observed on the Micro SD Card meet the federal definition of CSAM.

17. Additionally, in the photograph section of Johnson's phone, there were numerous pictures of a minor female in her underwear. Many of these pictures appeared to be taken without her knowledge or consent. During the review of Johnson's Kik account, many of these pictures of had been sent to other Kik users who were in the "Daddy/Daughter" groups.

18. Johnson was interviewed by agents after the electronic devices were discovered. Johnson stated that the phone and the Micro SD Card which were seized belonged to him. Additionally, he advised that he had a Kik account and that his username on Kik was "Humble."

19. Based on the foregoing, there is probable cause to believe that Adam Dalton Johnson is in violation of 18 U.S.C. § 2252A(a)(2) (receipt of child pornography) and 18 U.S.C. § 2252(a)(5)(B) (possession of child pornography).

Respectfully submitted,



Brandon Massey, Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.



HON. ANTHONY P. PATTI
United States Magistrate Judge

Dated: October 11, 2023